

PACHULSKI STANG ZIEHL & JONES LLP

Robert J. Feinstein (RF2836)

Bradford J. Sandler (BS1367, petition for attorney admission to W.D.N.Y. pending)

780 Third Avenue, 34<sup>th</sup> Floor

New York, NY 10017

Telephone: (212) 561-7700

Facsimile: (212) 561-7777

Email: rfeinstein@pszjlaw.com

bsandler@pszjlaw.com

[Proposed] Attorneys for

The Official Committee of Unsecured Creditors

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK**

In re:

NATIONAL AIR CARGO, INC.,

Debtor.

Chapter 11

Case No. 14-12414-MJK

**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR AN ORDER CLARIFYING THE REQUIREMENTS  
TO PROVIDE ACCESS TO CONFIDENTIAL OR PRIVILEGED INFORMATION**

**PLEASE TAKE NOTICE** that on November 24, 2014, the Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned chapter 11 cases, by and through its undersigned counsel, filed the *Motion of the Official Committee of Unsecured Creditors for an Order Clarifying the Requirements to Provide Access to Confidential or Privileged Information* (the “Motion”) with the United States Bankruptcy Court for the Western District of New York (the “Bankruptcy Court”). A copy of the Motion is attached hereto.

**PLEASE TAKE FURTHER NOTICE** that, objections, if any, to the relief requested in the Motion (i) must be in writing; (ii) conform to the Fed. R. Bankr. P. and Local Rules of the Court; and (iii) are due as soon as practicable in accordance with Local Rule 9013-1(B).

**PLEASE TAKE FURTHER NOTICE** that at the same time, you must also serve a copy of the response or objection upon: (i) (proposed) counsel to the Official Committee of Unsecured Creditors, (a) Pachulski Stang Ziehl & Jones LLP, 919 North Market Street, 17th Floor, P.O. Box 8705, Wilmington, DE 19899-8705 (Courier 19801), Attn: Bradford J. Sandler (bsandler@pszjlaw.com) and (b) Pachulski Stang Ziehl & Jones LLP, 780 Third Avenue, 34th Floor, New York, New York 10017, Attn: Robert J. Feinstein (rfeinstein@pszjlaw.com); (ii) counsel for the Debtor, Harter Secrest & Emery LLP, 12 Fountain Plaza, Suite 400, Buffalo, NY 14202-2293, Attn: Raymond L. Fink, Esq. (rfink@hselaw.com); and (iii) the Office of the United States Trustee for the Western District of New York, Olympic Towers, 300 Pearl Street, Suite 401, Buffalo, NY 14202, Attn: Joseph W. Allen, Esq.

**PLEASE TAKE FURTHER NOTICE** that the undersigned waives oral argument unless objections to the Motion are timely filed.

Dated: November 24, 2014

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Robert J. Feinstein

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